IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM

PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO: ETHICON WAVE 1 CASES

PLAINTIFFS' UPOPPOSED MOTION TO STRIKE AND REPLACE DOCUMENT

Plaintiffs hereby move the Court to strike ECF No. 2178 (Plaintiffs' Memorandum in Opposition to Defendants' Motion to Exclude General-Causation Testimony of Dr. Neeraj Kohli, M.D., M.B.A.) and replace the document with the one attached hereto as **Exhibit A**. On May 9, 2016 Plaintiffs filed ECF No. 2178 as a Response in Opposition to Defendants' Motion to Exclude General Causation Testimony of Dr. Neeraj Kohli, M.D., M.B.A. The document filed contained an error and therefore Plaintiffs request it be replaced by the document attached hereto as **Exhibit A**. The exhibits shall remain the same. Defendants do not oppose the relief herein

Dated: May 10, 2016

requested.

/s/ Aimee H. Wagstaff
Aimee H. Wagstaff
aimee.wagstaff@andruswagstaff.com
David J. Wool
david.wool@andruswagstaff.com
ANDRUS WAGSTAFF, P.C.
7171 W. Alaska Drive
Lakewood, Colorado 80226

Telephone: (303) 376-6360

/s/ Thomas P. Cartmell

Thomas P. Cartmell, Esq. Jeffrey M. Kuntz, Esq. Wagstaff & Cartmell LLP 4740 Grand Avenue, Suite 300 Kansas City, MO 64112

Tel: (816) 701-1102 Fax: (816) 531-2372 tcartmell@wcllp.com jkuntz@wcllp.com

/s/ D. Renee Baggett

Bryan F. Aylstock, Esq. Renee Baggett, Esq. Aylstock, Witkin, Kreis and Overholtz, PLC 17 East Main Street, Suite 200 Pensacola, FL 32563

Tel: (850) 202-1010 Fax: (850) 916-7449 rbaggett@awkolaw.com baylstock@awkolaw.com

Counsel for Plaintiffs in MDL No. 2327

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2016, a true and correct copy of this Motion to Strike and Replace, was served via electronic mail with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF counsel of record.

/s/ Aimee H. Wagstaff, Esq.